

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA	:
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-v-	:
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CHAIM LEBOVITS ET AL.,	:
	:
Defendants.	:
	:
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Hon. Sterling Johnson, Jr.
11-cr-134-SJ-SG

**DECLARATION OF SUSAN R. NECHELES, ESQ. IN SUPPORT OF
DEFENDANT MOSES NEUMAN'S MOTION
TO SUPPRESS EVIDENCE DERIVED FROM WIRETAPS**

STATE OF NEW YORK)
 : SS.:
COUNTY OF NEW YORK)

Susan R. Necheles hereby declares under penalty of perjury that:

1. I am an attorney duly admitted to practice in this Court. I am a partner in the law firm of Hafetz Necheles & Rocco, counsel to defendant Moses Neuman in this action. I submit this declaration and the attached exhibits in support of Mr. Neuman's motion to suppress evidence derived from the wiretap interceptions of his telephone.

2. Attached hereto as Exhibit A is the January 11, 2010 affidavit of U.S. Postal Inspector Maria Albright in support of the government's application for the interception of wire communications.

3. Attached hereto as Exhibit B is a transcript of a November 3, 2009 consensually recorded call between Morton Siegel and Moses Neuman.

4. Attached hereto as Exhibit C is a transcript of an October 29, 2009 consensually recorded call between Morton Siegel and Moses Neuman.
5. Attached hereto as Exhibit D is the February 18, 2010 affidavit of U.S. Postal Inspector Maria Albright in support of the government's application for continued interception of wire communications.
6. Attached hereto as Exhibit E is the March 19, 2010 affidavit of U.S. Postal Inspector Maria Albright in support of the government's application for continued interception of wire communications.
7. Attached hereto as Exhibit F is the February 5, 2010 affidavit of U.S. Postal Inspector Maria Albright in support of the government's application for a search warrant for Moses Neuman's text messages.
8. Attached hereto as Exhibit G is the April 30, 2010 affidavit of IRS Agent Sheldon Tang in support of the government's application for a search warrant for the electronic mail accounts of Moses Neuman and Yudah Neuman.
9. Attached hereto as Exhibit H is a chart listing certain intercepted calls of Moses Neuman that were not minimized.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 14, 2011.

s/Susan R. Necheles
Susan R. Necheles